



U.S. Department of Justice

*United States Attorney
Southern District of New York*

86 Chambers Street
New York, New York 10007

December 29, 2020

By ECF

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Emery Celli Brinckerhoff Abady Ward & Maazel, LLP v. United States Department of Justice et al.*, No. 20 Civ. 9917 (AKH)

Dear Judge Hellerstein:

This Office represents Defendants in the above-captioned Freedom of Information Act (“FOIA”) action. I write to respectfully request a brief extension of Defendants’ time to respond to the Complaint. Due to the complexity of the factual allegations at issue and the need for the Government to confer with investigating authorities, as well as the intervening holidays, the Government requests an extension of approximately two weeks, and an alignment of the Defendants’ answer deadlines, from December 31, 2020, and January 4, 2021 (*see* ECF Nos. 11-12), to January 18, 2021.

This is the Government’s first request for an extension. Plaintiff consents to this request.

I thank the Court for its consideration of this request.

Respectfully,

AUDREY STRAUSS
Acting United States Attorney for the
Southern District of New York

By: _____ /s/ *Lucas Issacharoff*
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